

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
LAREDO DIVISION**

JAMES KUYKENDALL,

Plaintiff,

vs.

**AMAZON STUDIOS, LLC, HECTOR
BERRELLEZ, JOHN MASSARIA, GOOD
PIXEL PRODUCTIONS, TILLER
RUSSELL, and THE INTELLECTUAL
PROPERTY CORPORATION,**

Defendants.

CIVIL ACTION No. 5:20-cv-00219

DECLARATION

DECLARATION OF MICHAEL CHAVARRIA

I, Michael Chavarria, hereby declare under penalty of perjury pursuant to 28 U.S.C. § 1746, as follows:

1. I am 59 years old and am competent to make this Declaration. I currently reside in Katy, Texas. The facts stated herein are based on my personal percipient knowledge, including evidence and documents that I have personally reviewed and conversations and meetings and conversations in which I directly participated.

2. I served with the Drug Enforcement Administration ("DEA") from 1985 to 2017 as a Special Agent. I was stationed in the following field offices: San Diego, California; Calexico, California; La Paz, Bolivia; San Ysidro, California; San Jose, Costa Rica; Guadalajara, Mexico; Mexico City, Mexico; and Houston, Texas. I was the Resident Agent in Charge in Guadalajara from June 2001 to approximately June 2005.

3. I did not know the Plaintiff in this action, former DEA Special Agent James Kuykendall, Sr., until 2020, when we were introduced to each other by a mutual friend via email. We have since communicated a few times but have never met in person.

4. Tiller Russell reached out to me in Texas via email the night of May 5, 2020, inquiring about several false and horrible allegations concerning Jaime Kuykendall that he planned to publish in a “documentary television series concerning the kidnapping and murder of DEA agent Kiki Camarena.” Russell gave me a deadline to reply – May 6, 2020 at 5:30pm.

5. I replied to Mr. Russell on May 6 from my home in Texas and informed him that the allegations he intended to publish were false, meritless, and in fact ridiculous. Having decades of experience investigating narcotics trafficking, I also informed him of the often unreliable nature of information obtained from informants, especially from those self-described as corrupt. Mr. Russell acknowledged receipt of my message, and I did not hear from him again.

6. Exhibit A is a true and correct copy of the email chain reflecting the above communications between me and Mr. Russell.

7. If I were to appear as a witness at any hearing or trial in this matter, I could and would testify to the above facts.

I declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the foregoing is true and correct.

Executed on this 28th day of April, 2021.

A handwritten signature in black ink, appearing to read "Michael Chavarria", written over a horizontal line.

MICHAEL CHAVARRIA

Enclosed: Exhibit A, Emails between Chavarria and Russell